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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

JENNIFER JOY FREYD,

Plaintiff,

v.

UNIVERSITY OF OREGON,
MICHAEL H. SCHILL, and HAL
SADOFSKY,

Defendants.

No. 6:17-cv-448-MC

**DECLARATION OF NATHAN
MORALES IN SUPPORT OF
DEFENDANT MICHAEL H. SCHILL'S
BILL OF COSTS**

I, Nathan Morales, declare as follows:

I am an attorney at Perkins Coie LLP and am one of the attorneys representing Defendant Michael H. Schill ("Schill") in the above-referenced matter. I make this declaration based on personal knowledge and am competent to testify to the matters herein.

1. In her original complaint naming Schill as a party, Plaintiff asserted a claim against Schill in both his personal and official capacity.

1 - DECLARATION OF NATHAN MORALES

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2. In July 2018, I began drafting a motion for summary judgment on Plaintiff's claim against Schill, in its entirety. That motion relied heavily on the transcripts of depositions taken in this case. The motion relied most heavily on excerpts from the depositions of Plaintiff and Schill.

3. In October 2018, I began discussions with counsel for Plaintiff about the possibility of dismissing the claim against Schill in his personal capacity. To prepare for those discussions, I reviewed the deposition transcripts, so that I could adequately assess the strength of Plaintiff's claim. Those discussions resulted in Plaintiff amending her complaint to remove the claim against Schill in his personal capacity.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: June 10, 2019

By: s/ Nathan R. Morales
Nathan R. Morales, OSB No. 145763